

*Reges v. Cauce, et al.*

**Exhibit A**  
**to Declaration of**  
**Gabriel Walters**

1 UNITED STATES DISTRICT COURT  
2 WESTERN DISTRICT OF WASHINGTON  
3 AT SEATTLE

4 STUART REGES, )  
5 )  
6 Plaintiff, )  
7 )  
8 vs. ) No. 2:22-cv-00964-JHC  
9 )  
10 ANA MARI CAUCE, et al., )  
11 )  
12 Defendants. )  
13 )

14 VIDEOCONFERENCE 30(B)(6) ZOOM DEPOSITION

15 UPON ORAL EXAMINATION OF

16 UNIVERSITY OF WASHINGTON

17 PROFESSOR CHADWICK ALLEN  
18

19 1:01 P.M.

20 TUESDAY, NOVEMBER 7, 2023

21 (ALL PARTICIPANTS AT THEIR RESPECTIVE LOCATIONS)

22 WITNESS LOCATION: SEATTLE, WASHINGTON

23 Reported by: Tami Lynn Vondran, CRR, RMR, CCR/CSR  
24 WA CCR #2157; OR CSR #20-0477; CA CSR #14435  
25 Job Number 6301546

## I N D E X

## EXAMINATION BY: PAGE:LINE

Mr. Walters .....4:19

Mr. Brecher .....80:18

Mr. Walters .....90: 4

## EXHIBITS FOR IDENTIFICATION MARKED

Exhibit 60 Plaintiff's Amended Rule 30(b)(6) ...12:21

Notice of Deposition to the

Corporate Representative of the

University of Washington

Exhibit 61 UW Office of Tribal Relations, .....58:18

UW\_Reges\_0011482-483

Exhibit 62 Presidential Blog entitled .....64: 1

Recognizing Indigenous Peoples' Day

## PREVIOUSLY MARKED EXHIBITS PAGE:LINE

Exhibit 3 Printout of UW web page entitled ....25:16

About OMA&amp;D

Exhibit 48 UW College of Engineering land .....56: 1

acknowledgments: Online training

for staff and faculty

1           Q.    (BY MR. WALTERS) I think it's being shared on  
2 the Zoom window too.

3                   Do you see the document in front of you  
4 labeled Plaintiff's Amended Rule 30(b)(6) Notice of  
5 Deposition?

6           A.    Yes.

7           Q.    And did you receive this document to appear at  
8 today's deposition?

9           A.    I don't believe so.

10          Q.    I'll represent that we sent this to counsel  
11 for the University.

12                   Could we scroll to the final page of this  
13 document.

14                   This is Schedule A of the notice. And near  
15 the bottom, it has three topics listed for examination.  
16 And Topic Number 2 is, "The University's impetus,  
17 development, implementation, and use of its land  
18 acknowledgment statement, available at" -- and then  
19 there's a URL which is  
20 [www.washington.edu/omad/about-omad](http://www.washington.edu/omad/about-omad).

21                   Is that the topic that the University has  
22 designated you to testify regarding today?

23          A.    Yes.

24          Q.    All right. Professor Allen, what is a land  
25 acknowledgment statement?

1           A.     So a land acknowledgment statement basically  
2     acknowledges that an entity like the University of  
3     Washington or another university is currently situated  
4     on lands that were already in the possession of  
5     indigenous people prior to the formation of that  
6     institution.

7           Q.     When did the university first become aware of  
8     land acknowledgments?

9           A.     I don't know.

10          Q.     Would you say there's a trend of universities  
11     adopting land acknowledgment statements?

12          A.     I would say yes. The trend has been going on  
13     now for some time.

14          Q.     Do you know approximately when that trend  
15     began?

16          A.     I would say about ten years ago you started  
17     seeing it happening in the U.S. more. I know my  
18     previous institution did not have a land acknowledgment.

19          Q.     What was your previous institution?

20          A.     I was at Ohio State University.

21          Q.     What is the purpose of a land acknowledgment  
22     statement?

23          A.     Well, I think the purpose can be multiple.  
24     Depends on the institution, depends on the individuals  
25     who are developing it and using it, but I think in

1       general the purpose of a land acknowledgment statement  
2       is to acknowledge the indigenous peoples whose lands the  
3       university or other institution sits on.

4             Q.     And so what message would you say a land  
5       acknowledgment statement conveys?

6             A.     Well, land acknowledgment, as the term  
7       "acknowledgment" suggests, it conveys a knowledge of --  
8       that indigenous peoples were in that space and continue  
9       often to be in that space.

10            Q.     Why is it desirable to have a land  
11       acknowledgment statement?

12            A.     That's a complicated question, but I would say  
13       briefly it's desirable to have a land acknowledgment as  
14       a way to signal to American Indian, Alaska Native,  
15       indigenous Hawaiian, other indigenous students that  
16       they're welcome at the university. And it's also a way  
17       to indicate to our tribal partners that they -- their  
18       community members, their students in particular are  
19       welcome at the university.

20            Q.     Did I hear you correctly that you said it  
21       was -- did you say it was a complicated question, or a  
22       difficult question?

23            A.     No. I said it's complex, just that it's  
24       multifaceted.

25            Q.     What are the other facets that you're thinking

1 of when you give that answer?

2 A. Well, each land acknowledgment has its own  
3 complexity dependent on the history of that specific  
4 place. So it's different in different parts of the  
5 United States. It's different in Canada, it's different  
6 in Aotearoa, New Zealand or Australia. The local  
7 context affects how a land acknowledgment looks and how  
8 it might be used.

9 Q. Does the University have a land acknowledgment  
10 statement?

11 A. The University does --

12 Q. Excuse me. Does the University of  
13 Washington -- to be clear, does the University of  
14 Washington have a land acknowledgment statement?

15 A. Yes. The University of Washington has a land  
16 acknowledgment statement, although I think it's  
17 important to point out it's not a mandatory statement.

18 Q. And for the record, when I refer to "the  
19 University," from this point on, I'll be referring to  
20 the University of Washington.

21 Is that clear?

22 A. Yes.

23 Q. When did the University adopt its land  
24 acknowledgment statement?

25 A. I believe the University adopted its land

1 acknowledgment statement around the time that I arrived  
2 at the University, around 2015. I'm not sure of the  
3 exact date.

4 Q. Was there anyone who advocated for the  
5 University to adopt its land acknowledgment statement?

6 A. Do you mean was there anyone advocating to  
7 adopt an -- a land acknowledgment statement or this one  
8 in particular?

9 Q. Let's cover both grounds. Let's start with a  
10 land acknowledgment statement generally.

11 Was there anyone advocating for the University  
12 to adopt a land acknowledge statement?

13 A. Well, it's before I arrived at the University,  
14 but I would imagine the answer is yes, there were many  
15 people advocating for the University to adopt a land  
16 acknowledgment.

17 Q. Did you do anything to become knowledgeable  
18 about that question prior to this deposition?

19 A. Well, I did not do anything specific to  
20 prepare for the deposition, but because my own field is  
21 American Indian studies, and I'm very interested in  
22 these issues myself, when I arrived at the University, I  
23 certainly learned the local history and what was  
24 happening then, and so I was -- became aware of what was  
25 happening fairly soon after I arrived at the University.

1           Q.    You said that it -- you would imagine that  
2           there -- that, yes, there were people advocating for the  
3           University to adopt a land acknowledgment statement.

4                   Do you know that to be the case?

5           A.    Well, I'm making that assumption based on the  
6           fact that we ended up having a land acknowledgment. And  
7           I know not from personal experience, but I have heard  
8           the history of how the land acknowledgment came to be,  
9           and so it's clear that there were not just one  
10          individual, but many people involved.

11          Q.    Do you know who was involved?

12          A.    I know some of the people who were involved.  
13          The former Tribal Liaison Iisaaksiichaa Ross Braine was  
14          probably leading that effort in his role as tribal  
15          liaison.

16          Q.    Could you spell his name for the court  
17          reporter.

18          A.    Oh, yeah. Iisaaksiichaa is a little hard, so  
19          let me think if I can spell it. Iisaaksiichaa,  
20          I-i-s-a-a-k-s-i-c-h-a, I think. Maybe two As at the  
21          end. And then Ross Braine, B-r-a-i-n-e. Iisaaksiichaa  
22          is his Crow name.

23          Q.    And is -- Ross and Braine, are those separate  
24          names? You're saying them as if they're combined, and  
25          so I just want to be clear.

1           Q.    And to come back to an earlier question. We  
2           said you would cover both, and you answered whether  
3           anyone advocated for the University to adopt a land  
4           acknowledgment statement.

5                   Do you know was there anyone who specifically  
6           advocated for the University to adopt the land  
7           acknowledgment statement that it ultimately did adopt?

8           A.    My understanding is that was a long  
9           negotiation among many different individuals, as well as  
10          different entities. And Iisaaksiichaa in his role as  
11          tribal liaison, one of his duties was organizing the  
12          annual tribal leadership summit. So as -- we host  
13          every -- usually April or May, our president invites the  
14          leaders of all of the federally recognized tribes in the  
15          state of Washington, which is currently 29. And I  
16          believe they also invite other native communities that  
17          are seeking recognition, to be as inclusive as possible.

18                   And my understanding is that during those  
19          meetings, there was discussion about what would the  
20          tribes like to have as a land acknowledgment for the  
21          University of Washington. Office of Minority Affairs &  
22          Diversity also has a Native American Advisory Board that  
23          consists of community members. And I believe they were  
24          probably also consulted -- what would they like to see  
25          as the University's land acknowledgment.

1           And then of course on campus, there are many  
2           constituencies. So there are native student  
3           organizations, there are groups of native faculty and  
4           staff, and then of course just other interested  
5           individuals who may or may not be native but may be  
6           interested in American Indian studies or just in our  
7           obligations to our tribal partners.

8           Q.    How long did it take to develop that  
9           statement?

10          A.    My understanding is it took two or  
11          three years. Again, it was before my arrival at the  
12          University, but my understanding is it was a multiyear  
13          process.

14          Q.    Was there a primary drafter of the language?

15          A.    I don't know for sure.

16          Q.    Were there draft versions?

17          A.    I don't know for sure.

18          Q.    Were any modifications made along the way?

19          A.    I don't know for sure. I would assume there  
20          were.

21          Q.    Who reviewed any draft versions there may have  
22          been?

23          A.    There, too, I don't know for sure, but I would  
24          imagine many people reviewed.

25          Q.    Who proposed edits?

1 backgrounds. And so wanting to be as welcoming as  
2 possible, not wanting to have a controversial statement  
3 that would in any way divide the community.

4 Q. Are land acknowledgment statements  
5 controversial?

6 A. Well, they can be.

7 Q. Is the University aware of controversy  
8 surrounding land acknowledgment statements?

9 A. Do you mean in general, or do you mean their  
10 particular statement?

11 Q. Let's start with in general.

12 A. Well, it's hard to know what the University  
13 knows, but those of us who work in the field of American  
14 Indian studies are aware that there can be controversies  
15 over land acknowledgments.

16 Q. And how are land acknowledgment statements  
17 controversial?

18 A. Well, sometimes the controversy is over which  
19 tribal nations get acknowledged and from which  
20 historical periods. I don't know how familiar you are  
21 with U.S. history and the broad history of U.S. -- you  
22 know, of colonialism and conquest, but indigenous people  
23 have been forced to move sometimes, you know, through  
24 the military. There are other ways that people have  
25 been relocated, forced to move. People have changed

1       their habitation because of the forces of settler  
2       expansion, colonial governments. And so it's not always  
3       as simple as the land was always occupied by the exact  
4       same group of people since time immemorial.

5           Q.     Let's look at the University's land  
6       acknowledgment statement.

7                     How is that controversial?

8           A.     Well, it's potentially controversial because  
9       the Duwamish are not named explicitly. And some people  
10      think the Duwamish should be named explicitly, and other  
11      people think that what we have is appropriate because  
12      the language is all tribes and bands within the  
13      Muckleshoot, Tulalip and Suquamish nations -- I don't  
14      know how much of that history you want me to describe.

15                    MR. WALTERS: I would like to show Exhibit 3.

16                    (Previously marked Exhibit Number 3.)

17           Q.     (BY MR. WALTERS) Is this a printout -- oh,  
18      pardon me.

19                    Can you see Exhibit 3 on your screen,  
20      Professor Allen?

21           A.     I can, but it's rather small.

22                    Ah. That's better.

23           Q.     And if you would go to the file share -- the  
24      Exhibit Share site, I think it should be -- yes, it  
25      should be in the marked exhibits folder, if you need to

1 former tribal liaison, who I mentioned before,  
2 Iisaaksiichaa Ross Braine. That position has changed  
3 since this.

4 Q. Who currently holds that position?

5 A. It's now called the Director of Tribal  
6 Relations, and her name is Sherri Berdine.

7 Q. What is the role of the UW Tribal Liaison or  
8 now the Director of Tribal Relations?

9 A. So the role has shifted a little bit. The new  
10 Director of Tribal Relations sits in the Office of  
11 External Affairs and is part of the team that does all  
12 of the University's government relations. So people who  
13 work with our Federal Government, people who work with  
14 the state, local, regional government entities, and then  
15 now with our tribal government partners.

16 And so the role of the Director of Tribal  
17 Relations is to foster our relationships to, again, the  
18 29 federally recognized tribes in Washington and other  
19 indigenous communities, also to think about our urban  
20 Indian communities and to make sure that we have really  
21 good working relationships with those entities.

22 Sherri Berdine is relatively new in her role  
23 and still fleshing out exactly what all the office will  
24 do, but those are the main functions.

25 Q. Why is that important to the University to

1 have those relations that you just described with the  
2 local tribes?

3 MR. BRECHER: Objection. Scope.

4 You can answer.

5 A. So that's also a complicated question because  
6 it's -- there's a lot of reasons. Any University that  
7 does research that's relevant to native communities  
8 should be building relationships with native  
9 communities. And so the University of Washington has a  
10 lot of research relationships with tribal nations --  
11 forestry, fisheries, oceanography, other aspects of sort  
12 of resource development and resource management, as well  
13 as through medicine, public health, social work,  
14 education. We have lots of sort of specific  
15 disciplinary-specific relationships with tribes and  
16 groups of tribes.

17 As I mentioned before, the Centennial Accord,  
18 we're sort of obligated as a state entity to consult the  
19 tribal nations on issues that are relevant to them, that  
20 they would have a relevant interest in. And so that  
21 covers a lot that the University actually does.

22 Q. (BY MR. WALTERS) And so does the University  
23 consider the land acknowledgment statement to be part of  
24 that relationship building effort?

25 A. I would imagine so. I think for many of us,

1     you know, it's not the -- the statement is not the most  
2     important part; the relationships are the important  
3     part. But that's why, in a sense, it taking several  
4     years for it to create this land acknowledgment is so  
5     important.

6             It's about building relationships with our  
7     tribal partners. Rather than just simply quickly  
8     creating a statement and then slapping it on lots of  
9     websites, it's really the relationships that matter.  
10    And that's the part that people most care about.  
11    Especially people in native communities and native  
12    faculty, staff and students on campus care most about  
13    the relationships and what those relationships can  
14    foster rather than the statement itself.

15            Q.    What was the state of those relationships  
16    prior to the development of the land acknowledgment  
17    statement?

18            A.    Well, it's before my time in coming to the  
19    University, but my understanding is that there is a long  
20    history of distrust between tribal nations and the  
21    University of Washington. And that has -- it's a  
22    complicated long history. Some of it is specific to the  
23    University of Washington, but other parts of it are  
24    really just -- U.S. institutions of higher education and  
25    their research arms have done a lot of damage

1 historically in native communities.

2 I don't know how aware you are of that  
3 history, but there has been a lot of intrusive research  
4 that has gone into native communities, including work on  
5 human subjects, that has really been abusive and  
6 violated the trust of native communities.

7 So people are understandably distrustful when  
8 a large institution like the University of Washington or  
9 another state institution comes in and says, "We want to  
10 do research, we want to partner with you." Tribal  
11 nations are often wary of that given those specific  
12 histories, as well as the larger history of U.S.  
13 colonialism and how indigenous peoples have been treated  
14 by the Federal Government, state governments, state  
15 institutions, et cetera.

16 So building those relationships of trust takes  
17 time. And a land acknowledgment is a small part of  
18 that. But it is a way to open up a conversation and ask  
19 the affected and relevant tribal nations, "How would you  
20 like to be acknowledged by our institution? How would  
21 you like to be described? How would you -- you know,  
22 what name would you like us to use for you?"

23 So that's -- I think that's part of it.

24 Q. And so did the development of this land  
25 acknowledgment statement work toward building trust

1 between the University of Washington and the local  
2 tribes?

3 A. I like to think so. It is an ongoing project,  
4 but, yes, I like to think so.

5 Q. Did the development of the land acknowledgment  
6 statement help to open that conversation between the  
7 University of Washington and the local tribes?

8 A. Again, it's before my time, and I don't know  
9 about opening that conversation. I think there were  
10 already conversations, but I think it was a useful tool  
11 for continuing to develop relationships with our local  
12 tribal partners.

13 Q. Who were the tribal elders who gave input to  
14 the land acknowledgment statement?

15 A. So I don't know them by name. My  
16 understanding is -- so when the Intellectual House was  
17 being developed -- and that was the result of over  
18 40 years of activism of trying to get native space on  
19 the campus of the University of Washington, which  
20 involved of course generations of students, faculty,  
21 staff, as well as community partners.

22 When it was moving toward actually happening,  
23 and the building was going to be completed, which would  
24 happen in 2015, part of what was developed was kind of  
25 an advisory board of elders. So elders from tribes in

1 about the land acknowledgment. So that would have  
2 included probably students, staff and faculty at the  
3 University, as well as just other interested people,  
4 like alumni and others who might have been around for  
5 some of those meetings.

6 Q. So then is it fair to say that several  
7 individuals and groups gave input to the development of  
8 the University's land acknowledgment statement?

9 A. Yes. Many.

10 Q. Earlier, I believe you used the word  
11 "constituencies." Does the University consider these  
12 individuals or groups to be constituencies in the  
13 development of the land acknowledgment statement?

14 A. I don't know if the University would use that  
15 language.

16 Q. Well, testifying for the University, you used  
17 that language previously in your testimony.

18 Is that a fair word to use?

19 A. I'm going to probably -- I don't know. I'm  
20 not sure if I would -- now that you're asking me, I'm  
21 not sure if I would use that word "constituents" per se.  
22 These are communities that the University engages with.

23 Q. I'm trying to understand that question. If  
24 you would use that word in response to a prior question,  
25 why would you not use that word in your words now that

1 I'm asking you? Could you explain that answer.

2 A. Well, I like the word "constituencies," and I  
3 probably just used it, you know, as my quick answer.  
4 But if we went back and parsed it, I may or may not want  
5 to use it on behalf of the University.

6 Q. To be clear, all of your testimony here today  
7 is on behalf of the University; correct?

8 A. Yes.

9 Q. Would "stakeholders" be a fair word to use in  
10 the development of the land acknowledgment statement  
11 with respect to the groups and individuals we've gone  
12 through?

13 A. Yes. I think "stakeholders" would be a  
14 good -- a good term.

15 Q. Is there any other term that you would use to  
16 describe those groups or individuals, stakeholders,  
17 constituencies we've talked about -- any other terms?

18 A. No. I actually think stakeholders is a good  
19 one.

20 Q. What stake do you think these individuals or  
21 groups have in the University's land acknowledgment  
22 statement?

23 A. Well, I think all of these individuals and  
24 groups are concerned and interested in having the  
25 University be a welcoming place for native students,

1 is spoken by UW leadership during events to acknowledge  
2 that our campus sits on occupied land"; correct?

3 A. Yes.

4 Q. Earlier you testified that the history is a  
5 political one. Is the land acknowledgment statement in  
6 acknowledging that history a political statement?

7 MR. BRECHER: Objection. Legal conclusion.  
8 You can answer.

9 A. Well, I would say it's a political statement  
10 in the sense that almost all discourse is political  
11 because it's caught up in power. You know, I think a  
12 lot of us would say that to not have a land  
13 acknowledgment in 2023 would be making a political  
14 statement. I don't know that you could say that there's  
15 a place outside of politics when it comes to these  
16 issues because of the long, complicated history of  
17 American Indian sovereignty and U.S. federal  
18 sovereignty, state sovereignty. These are -- I know I'm  
19 not telling you anything you don't know. These are  
20 complicated, messy histories that are difficult to  
21 reduce to a single statement.

22 Q. (BY MR. WALTERS) And what you've just  
23 described, this is a matter of great public import, is  
24 it not?

25 MR. BRECHER: Objection. Foundation.

1 (Break taken from 2:44 p.m. to 2:56 p.m.)

2 Q. (BY MR. WALTERS) Professor Allen, are there  
3 disagreements with respect to using land acknowledgment  
4 statements?

5 MR. BRECHER: Objection. Vague. Foundation.  
6 You can answer.

7 A. I guess, yes. I mean, there -- it would be  
8 helpful to know what you mean more precisely by  
9 disagreements, but I'll say yes.

10 Q. (BY MR. WALTERS) Well, what do you understand  
11 disagreements about land acknowledgments to mean?

12 A. Well, I think there's a wide range of  
13 opinions, depending on people's subject position and  
14 their sense of American Indian sovereignty, American  
15 Indian history, U.S. sovereignty, U.S. history.  
16 Depending on people's political views, some people think  
17 we should absolutely be having land acknowledgments.  
18 It's absolutely a thing we should do. Others think  
19 they're only performative, so they're not -- we  
20 shouldn't be doing them, we should be doing other  
21 things. Other people think the U.S. should not be  
22 acknowledging ongoing U.S. -- ongoing tribal sovereignty  
23 within the United States.

24 So it depends on your kind of political  
25 beliefs. There's not a uniform agreement on those very

1 broad and complicated issues.

2 Q. And so the University has decided to use land  
3 acknowledgment statements; correct?

4 A. The University has decided to make a land  
5 acknowledgment available. It has not mandated the use  
6 of a land acknowledgment.

7 Q. But University leaders utter the land  
8 acknowledgment statement; correct?

9 A. University leaders sometimes use the land  
10 acknowledgment. It's very context specific, both to the  
11 situation as well as to the specific leader. You know,  
12 in my roles, I attend many events. Sometimes you hear a  
13 land acknowledgment, sometimes you don't. It really  
14 depends. But there is no uniform application of using a  
15 land acknowledgment.

16 Q. Earlier I used the word "disagreement" with  
17 respect to the use of land acknowledgment statements.

18 Would you agree that there is a public debate  
19 about the use of land acknowledgment statements as you  
20 described?

21 MR. BRECHER: Objection. Scope.

22 You can answer.

23 A. Yes. There have been a number of public  
24 discussions and disagreements in the press, certainly  
25 online. More locally, you know, comes up. Again,

1 highly contextualized depending on the situation.

2 Q. (BY MR. WALTERS) When did the University  
3 first become aware of that debate with respect to the  
4 use of land acknowledgment statements?

5 MR. BRECHER: Same objection.

6 You can answer.

7 A. I don't know when the University became aware  
8 of controversy. That said, I would assume the  
9 University has been aware since those controversies  
10 began because we have faculty in multiple disciplines  
11 whose work intersects issues around tribal sovereignty,  
12 U.S. history, you know, et cetera, that -- so people  
13 would be aware of all those issues.

14 Q. (BY MR. WALTERS) Am I correct that you  
15 testified earlier that in 2015 when you joined the  
16 University, it had developed the land acknowledgment  
17 statement, or was it in the process of developing?

18 Could you clarify that for me.

19 A. I think it was in the process of developing in  
20 2015. I believe discussions had already begun and then  
21 it was ongoing. I don't know how much of the context is  
22 relevant, about the role of the tribal liaison and  
23 things, but there was a lot of shifting leadership that  
24 was happening in 2015, so it's a little difficult to  
25 know exactly -- President Cauce became president in

1 2015. There was a shift in provost, there was a shift  
2 in the vice president of Minority Affairs & Diversity.  
3 Also there was an interim in 2015, 2016. The current  
4 person came in 2016.

5 So there was a lot of shifting happening in  
6 leadership as I was coming into the University. The  
7 tribal liaison position was reporting through the Office  
8 of Minority Affairs & Diversity, and then had a dotted  
9 line to the president, and then has since evolved where  
10 now it's in the Office of External Affairs.

11 So part of this, there's a lot of shifting in  
12 our -- in the University's sort of relationship to that  
13 role.

14 Q. And so is it fair to say that at least at that  
15 time in 2015, the University was aware of the debate  
16 surrounding the use of land acknowledgment statements?

17 A. Yes.

18 Q. Is the University familiar with an article  
19 published in The Atlantic by the writer Graeme Wood  
20 titled "'Land Acknowledgments' Are Just Moral  
21 Exhibitionism"?

22 MR. BRECHER: Objection. Scope.

23 You can answer.

24 A. So I'm not sure exactly how to answer that  
25 when you say is the -- was the University aware.

1 also choosing not to have a mandated land  
2 acknowledgment.

3 MR. WALTERS: Thank you, Professor Allen.

4 Why don't we just take five more minutes, and  
5 I'll see if we can conclude.

6 THE WITNESS: Okay.

7 THE COURT REPORTER: I'm off the record.

8 (Break taken from 3:03 p.m. to 3:11 p.m.)

9 Q. (BY MR. WALTERS) Professor Allen, the  
10 University is aware that the debate with respect to the  
11 use of land acknowledgment statements is present and  
12 ongoing; correct?

13 MR. BRECHER: Objection. Scope.

14 You can answer.

15 A. Yes.

16 MR. WALTERS: I have no further questions for  
17 you at this time.

18 I'm going to hold this deposition open for a  
19 few reasons. The first one is that this is a 30(b)(6)  
20 deposition of the University. We have noticed  
21 additional topics, and there will be further witnesses  
22 to testify to those topics.

23 The second reason is that the witness today  
24 has answered several questions with respect -- by saying  
25 "I don't know" or "I believe" or "I would assume," and

1 (Break taken from 3:25 p.m. to 3:36 p.m.)

2

3 EXAMINATION (continued)

4 BY MR. WALTERS:

5 Q. Professor Allen, what was Professor Reges'  
6 land acknowledgment statement?

7 A. My memory is the statement was Coast Salish  
8 people have no right to this land based on John Locke's  
9 theory of labor.

10 Q. I'll recite it. And this is from memory, so  
11 Aaron can double-check me in the records.

12 The statement that Professor Reges put in his  
13 winter quarter 2022 syllabus read, "I acknowledge that  
14 by the labor theory of property that Coast Salish people  
15 can claim historical ownership of almost none of the  
16 land currently occupied by the University of  
17 Washington."

18 Does that match your recollection, Professor  
19 Allen?

20 A. Yes.

21 Q. You testified that you counseled students  
22 because they were upset by that statement; correct?

23 A. Yes.

24 Q. That was because of the content of the  
25 statement; correct?

1 MR. BRECHER: Objection. Foundation.

2 You can answer.

3 A. Yes.

4 Q. (BY MR. WALTERS) Did they tell you that it --  
5 they were upset by the content of the statement, the  
6 students?

7 A. Yes.

8 Q. Did you ever ask Professor Reges what he meant  
9 by the content of the statement?

10 A. No.

11 Q. Did you ever ask Professor Reges if he wanted  
12 to cause a spectacle by his statement?

13 A. No.

14 Q. Did you ever ask Professor Reges if he wanted  
15 conservative media to pay attention to his statement?

16 A. Well, I did not ask him that, no.

17 Q. Did you talk to him at all about his  
18 statement?

19 A. No.

20 Q. Did you ever ask him what he wanted to come  
21 about by his statement?

22 A. No.

23 Q. You testified that his statement was  
24 dehumanizing.

25 Is that your personal opinion?

1           A.     Yes.

2           Q.     Is that the opinion of the University of  
3     Washington?

4           MR. BRECHER:  Objection.  Foundation.

5                 You can answer.

6           A.     I'm going to say yes because I think it's  
7     pretty baldly dehumanizing if you know anything about  
8     John Locke's theory of property and what it's based on  
9     and how it's been used as a justification for conquest  
10    and slavery.

11          MR. WALTERS:  I have nothing further.

12          MR. BRECHER:  Nothing from me.

13          MR. WALTERS:  As I said before, we'll keep the  
14    deposition open for the reasons I previously put on the  
15    record.

16                 Thank you, Professor Allen, for your time and  
17    your answers.  I appreciate it.

18          MR. BRECHER:  Thank you, Gabe.

19                 And, Tami, we'll review and sign.

20          THE COURT REPORTER:  Thank you.

21                 Gabe, are you ordering the transcript?

22          MR. WALTERS:  Yes.  We have ordered a rough  
23    and the -- I think the usual ten business days will be  
24    fine for us.

25          THE COURT REPORTER:  Okay.  Aaron, do you also